

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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In the Matter of )  
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U.S. Department of Health and Human Services )  
Substance Abuse and Mental Health )  
Administration Petition for Permanent )  
Reassignment of Three Toll Free Suicide )  
Prevention Hotline Numbers )  
)

CC Docket No. 07-271

Toll Free Service Access Codes )  
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CC Docket No. 95-155

**DECLARATION OF REESE BUTLER**

I, Reese Butler declare the following:

1. My name is H. Reese Butler, II, I am over eighteen years of age, and I have personal knowledge of the statements made in this declaration and/or believe them to be true to the best of my knowledge and belief.
2. I am the President & Founder of the Kristin Brooks Hope Center ("KBHC"). As the President, I oversee the day-to-day operations of KBHC with the oversight of KBHC's Board of Directors.
3. KBHC currently operates fourteen suicide prevention hotlines.<sup>1</sup> These hotlines are: (1) the Spanish Hotline, 1-800-SUICIDA, [www.suicida.org](http://www.suicida.org), (2) the Hopeline, 1-800-442-HOPE, (3) the Youth America Hotline 1-877-YOUTHLINE, [www.youthline.us](http://www.youthline.us), (4) the veteran peer counseling hotline, 1-877-VET2VET, [www.veteranscall.us](http://www.veteranscall.us), (5) the post-partum depression hotline, 1-800-PPDMOMS, [www.ppd moms.us](http://www.ppd moms.us), (6) the graduate student hotline, 1-800-GRADHLP, [www.gradhelp.org](http://www.gradhelp.org), (7) the Psychiatric Emergency Response Network, 1-866-FOR-PERN, [www.pern.us](http://www.pern.us), (8) the Ring to Hopeline Network, 1-800-722-9498, (9) the Ring to Hopeline Network, 1-800-827-7571, (10) the Ring to Hopeline Network, 1-877-495-0009, (11) the Ring to Hopeline Network, 1-888-861-8460, (12) the Ring to Hopeline Network, 1-866-771-

<sup>1</sup> KBHC has added two Korean language hotlines since the filing of its Comments on February 28, 2011, in response to the Wireline Competition Bureau's January 14, 2011, Order and Request for Comment, WC Docket Nos. 07-721 and 95-155, DA 11-80 (rel. Jan. 14, 2011).

1276, (13) a Korean language hotline, 1-888-5Korean, and (14) a second Korean language hotline, 1-855-SPKOREA. KBHC is the subscriber of record for all of these numbers, except for 1-800-SUICIDA.

4. Prior to the Federal Communications Commission's ("FCC" "Commission") 2007 *Temporary Reassignment Order*,<sup>2</sup> KBHC operated 1-877-SUICIDA as its Spanish language hotline. When KBHC lost its Spanish language hotline (1-877-SUICIDA) as a result of the *Temporary Reassignment Order*, KBHC looked for an alternative number for its Spanish language outreach. The number 1-800-SUICIDA ("the number") was not available, so KBHC approached the subscriber of record for the number (which was 800 Answer, Inc.) to see if the number could be used to operate a replacement Spanish language suicide prevention hotline. The subscriber of the number would not release or agree to a voluntary and FCC-approved transfer of ownership of the number, but he agreed to route calls to the number to KBHC so long as KBHC operated it as a Spanish language suicide prevention hotline. The subscriber's carrier (Qwest) was then given instructions to route calls made to 1-800-SUICIDA to Micktel Corporation ("Micktel") which would then route the calls to the appropriate Spanish speaking crisis center. KBHC then proceeded to operate the number as a national Spanish language suicide prevention hotline.

5. Because KBHC is not the subscriber of record of the number, KBHC did not receive notice from the carrier or RespOrg when the status of the number changed. In addition, the Substance Abuse and Mental Health Services Administration ("SAMHSA") of the Department of Health and Human services never notified KBHC of any problems in connection with the number. KBHC first learned of an error affecting the number when notified by the FCC on March 4.

6. KBHC restored service to the number on March 4, 2011, within hours of receiving the FCC's March 4 Letter. KBHC restored service by immediately contacting the number subscriber who in turn contacted the carrier and the RespOrg and corrected the error. Upon information and belief, the owner notified the RespOrg and/or carrier that any changes to the number and its routing had been made in error and told the RespOrg and/or carrier to restore the number immediately, which it did.

7. KBHC never made a request to transfer/suspend/re-route/disconnect the number, no authorization was given by KBHC to transfer/suspend/re-route/disconnect the number, the account was in good standing, and, prior to the FCC's March 4 letter, no one (including the RespOrg, the number subscriber, the carrier, and SAMHSA) notified KBHC that calls to the number were no longer being routed to a Spanish speaking crisis center. The subscriber of record represents to KBHC that he does not believe that he authorized suspension, re-routing, transfer or disconnection of the number and that, if he did, it was unintentional and it may have been done in error in connection with changes made to the RespOrg for other numbers for which he is the subscriber.

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<sup>2</sup> *In the Matter of Toll-Free Service Access Codes*, Order dated January 22, 2007, CC Docket No. 95-155, DA Docket No. 07-130.

8. Despite requests for information, the carrier Qwest has not provided any information to KBHC as to why the number was transferred, disconnected, suspended, or re-routed. As a result, KBHC cannot ascertain exactly what occurred and who is responsible.

9. The Responsible Organization from 2007, when KBHC began operating the number, until sometime in 2010 was the Business Edge Group Inc. Sometime in 2010, Zone Telecom, Inc. became the Responsible Organization. Beginning on March 4, 2011, the Responsible Organization became Micktel. The carrier is Qwest.

10. For those numbers which KBHC controls as subscriber of record, any problems with or interruptions of service would have been and will continue to be reported directly to KBHC by the RespOrg and carrier Micktel. There have been no outages or disruptions in service of those numbers controlled by KBHC as subscriber of record since it began to use Micktel in 2006 as its carrier and RespOrg. These numbers controlled by KBHC could not be changed, transferred or disconnected without KBHC's knowledge, as occurred in connection with 1-800-SUICIDA.

11. For the sole number for which KBHC is not the subscriber of record (1-800-SUICIDA), KBHC previously did not separately monitor this number. KBHC had no reason to believe that the number would be re-routed, suspended, transferred or disconnected in violation of its usage agreement.

12. KBHC now has new procedures in place that will ensure that all of its numbers remain operational. Micktel is now the RespOrg for 1-800-SUICIDA and KBHC has been designated as the billing agent for the number. As a result, in the unlikely event that any suspension, transfer, re-routing or disconnection occurs, KBHC will be notified immediately by the RespOrg. Because KBHC is the subscriber of record for all of its other numbers, it will continue to be notified of any outages or disconnections or other changes in connection with those numbers as soon as any such outages, disconnections or changes occur.

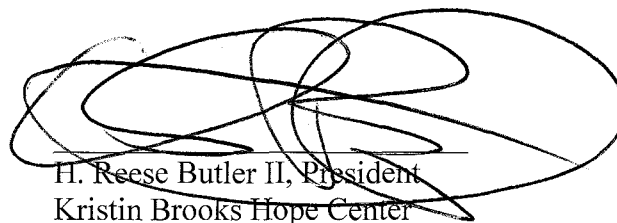
13. In addition, KBHC and Micktel are in the process of instituting a computer program that will check the hotlines every hour to ensure that they are active. Should a hotline become inactive for any reason, KBHC will be immediately notified. Specifically, Micktel is setting up an automated dialer that will call all of KBHC's hotline toll free numbers every hour and play this message: "This is a service validation call, please press 1 to confirm this call was answered." This message will loop until the key press was detected. The time it takes to get this key press is logged. If no key press is detected, an alert email is sent to our 24 hour Emergency Response Center prompting an investigation. From this, KBHC will be able to verify that calls are being correctly routed, and also capture an Average Time to answer statistic which is helpful in monitoring the response speed of the Hopeline Network call centers as well. Up until the time that that computer program is in place, a supervisor from KBHC will be calling 1-800-SUICIDA manually every day to ensure that it is operating and numbers are being routed to the appropriate crisis center.

14. Furthermore, in the future, KBHC's monthly bills will be broken down by the number called. As a result, KBHC will become aware if one of the numbers stops receiving calls and will know to investigate it in the event both that that happens and that KBHC has not already become aware through one of the multiple other procedures implemented.

15. At one point after the *Temporary Reassignment Order* and during the time that SAMHSA has been operating 1-800-SUICIDE, KBHC was contacted by someone with the Oprah Winfrey Show and told that the number 1-800-SUICIDE was not working in the Chicago area. KBHC immediately tried to contact the appropriate personnel at SAMHSA but was unable to do so because the personnel were out of the country. Because KBHC believed this was a problem that needed to be addressed immediately, when KBHC could not reach the relevant SAMHSA personnel, KBHC contacted the carrier for 1-800-SUICIDE directly and explained what was going on so the problem could be corrected without delay, which it was.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information and belief.

March 17, 2011



H. Reese Butler II, President  
Kristin Brooks Hope Center